

S P E K T R

BOUTIQUE HOTEL YALIKAVAK

INFORMATION NOTICE FOR THE GUEST IN ACCORDANCE WITH THE LAW ON THE PROTECTION OF PERSONAL DATA

1. IDENTITY OF THE DATA CONTROLLER AND DEFINITIONS

a.) Identity of the Data Controller:

As Spektr Otel Turizm Danışmanlık İnşaat Emlak Mobilya Teknik Servis Hizmetleri Sanayi ve Ticaret Limited Şirketi, we show maximum sensitivity to the security of your personal data. With this awareness, our Company, with the full understanding of its responsibility under the Law, informs its guests in the capacity of "Data Controller" as follows and enlightens them within the scope specified in Article 10 of the Law.

Data Controller: Spektr Otel Turizm Danışmanlık İnşaat Emlak Mobilya Teknik Servis Hizmetleri Sanayi ve Ticaret Limited Şirketi
Address: Mustafa Kemal Mah. Şehit Öğretmen Şanay Aybuke Yalçın Cad. (2120. Cad.) Tera Plaza No: 11/3 Çankaya ANKARA
Phone No.: (0) 252 385 20 20
Website: www.spektr-hotel.com
E-mail Address: info@spektr-hotel.com
Mersis No.: 0781054400100017

This Information Notice will be updated by Spektr when necessary and the updated text will be published.

b.) Definitions:

Company: SPEKTR OTEL TURİZM DANIŞMANLIK İNŞAAT EMLAK MOBİLYA TEKNİK SERVİS HİZMETLERİ SANAYİ VE TİCARET LTD. ŞTİ. (Spektr)
Law: Law on Protection of Personal Data No. 6698, published in the Official Gazette dated 7 April 2016 and numbered 29677.
Explicit Consent: The consent given on a specific subject, based on information and free will, that is clear without any hesitation and limited only to that transaction.
Data subject: Natural person whose personal data are processed.
Personal Data: Any information relating to an identified or identifiable natural person.
Special Categories of Personal Data: Data relating to race, ethnic origin, political opinions, philosophical beliefs, religion, sect or other beliefs, appearance and dressing, membership of association, foundation or trade-union, health, sexual life, criminal conviction and security measures, and biometrics and genetics.
Processing of personal data: Any operation which is performed upon personal data such as collection, recording, storage, preservation, alteration, adaptation, disclosure, transfer, retrieval, making available for collection, categorization or blocking its use by wholly or partly automatic means or otherwise than by automatic means which form part of a filing system.
Data controller: Natural or legal person who determines the purposes and means of the processing of personal data, and who is responsible for establishment and management of the filing system.

Data Controllers Registry Information System: An information system created and managed by the Presidency, accessible over the internet, to be used by data controllers in their application to the Registry and other related transactions. "VERBİS"

For definitions not included in this text, the definitions in the Law and legislation are valid.

2. METHOD AND LEGAL REASON OF DATA COLLECTION

The personal data of the guest is collected by Spektr with the following methods and legal reasons:

- Since it is necessary for the Company to fulfill its legal obligation as a data controller and because it is directly related to the conclusion and performance of the contract with the guest, it is necessary to process personal data; Receiving physical or electronic accommodation records at the front office counters for reservation and registration/entry, business partner websites and agencies that the Company works with, phone calls, mail-order, Company website and social media accounts.
- Since it is necessary to process personal data because it is directly related to the performance of the contract with the guest; Physical documents, forms and invoices in case of request for spa/massage or restaurant service on the company campus.
- Since it is mandatory for the Company to fulfill its legal obligations as a data controller and data processing is mandatory for the legitimate interests of the company, provided that it does not harm the fundamental rights and freedoms of the data subject; Written forms, e-mail, in order to receive the requests and complaints of the guests.
- Since it is mandatory for the Company to fulfill its legal obligations as a data controller and data processing is mandatory for the legitimate interests of the company, provided that it does not harm the fundamental rights and freedoms of the data subject; The cameras that the company has placed on the company campus to ensure workplace safety.
- As it is mandatory for the Company to fulfill its legal obligation as a data controller; the company's servers.
- Since data processing is mandatory for the Company to fulfill its legal obligation as a data controller and for the establishment, exercise or protection of the right; administrative and judicial correspondence.
- Provided that you give your express consent; Photos and videos taken at the company campus or at the events it organizes.

Your personal data collected with the above-mentioned methods and legal reasons are as follows:

- **Identity Data:** Name, surname, TR identity no., citizenship information, vehicle plate information, T.R. ID card information (TR identity no., serial no., wallet no., father's name, mother's name, place of birth, province, district, neighbourhood, volume no., family serial no., serial no., household no., page no., registration no., place of issue, reason for issue, date of issue, previous surname), identity card copy, passport information and copy for foreign citizens, signature.
- **Communication Data:** Telephone number, e-mail address, residence address.
- **Financial Data:** Payment information, credit card information.
- **Physical Location Security Information Data:** Audio-visual data provided by the cameras installed to ensure security on the company's campus.
- **Visual and Audio Data:** Photographs and audio/silent videos taken at the company campus or at the events it organizes.
- **Transaction Security Data:** IP address information, log records.
- **Customer Transaction Data:** Order information, stay dates, VIP status.
- **Request and Complaint Data:** Customer requests and complaints.

3. FOR WHAT PURPOSE PERSONAL DATA WILL BE PROCESSED

We process your personal data, which are categorized above and specified one by one under the headings, limited to the purposes we have explained in the table below and based on the legal reasons we have stated.

PROCESSED PERSONAL DATA	PURPOSE OF PROCESSING	LEGAL REASON FOR PROCESSING
<ul style="list-style-type: none">• Identity Data• Communication Data• Financial Data• Customer Transaction Data (Stay dates)	<ul style="list-style-type: none">• Fulfillment of reservation and registration procedures.• Execution of the company's activities in accordance with the legislation.• Providing information to authorized persons, institutions and organizations.• Execution of finance and accounting works.• Execution of service sales processes.• Execution of communication activities.• Execution of storage and archive activities.	<ul style="list-style-type: none">• Data processing is necessary, provided that the contract is concluded with the guest and it is directly related to the performance of this contract. (Art.5/2-c)• It is mandatory for the data controller to fulfill its legal obligation. (Art.5/2-ç)
<ul style="list-style-type: none">• Physical Space Security Information Data	<ul style="list-style-type: none">• Ensuring the security of the company campus, fixtures, personnel, customers and visitors, ensuring security within the company.	<ul style="list-style-type: none">• Data processing is mandatory for the legitimate interests of the company, provided that it does not harm fundamental rights and freedoms. (Art.5/2-f)
<ul style="list-style-type: none">• Identity Data• Communication Data• Request and Complaint Information	<ul style="list-style-type: none">• Recording and evaluation of requests and complaints made to the company.• Execution of customer relationship management processes.• Improving the services offered by the company.	<ul style="list-style-type: none">• Data processing is mandatory for the establishment, exercise or protection of a right. (Art.5/2-e)• Data processing is mandatory for the legitimate interests of the company, provided that it does not harm fundamental rights and freedoms. (Art.5/2-f)
<ul style="list-style-type: none">• Visual and Audio Data	<ul style="list-style-type: none">• Promotion, marketing and advertising of the company and its events.	<ul style="list-style-type: none">• Explicit consent (Art.5/1)
<ul style="list-style-type: none">• Transaction Security Data	<ul style="list-style-type: none">• Fulfilling the Company's obligations under the Law No. 5651 on Regulating Broadcasts Made on the Internet and Combating Crimes Committed Through These Broadcasts, Electronic Communications Law No. 5809, Regulation on Internet Collective Use Providers and related legislation.	<ul style="list-style-type: none">• It is mandatory for the data controller to fulfill its legal obligation. (Art.5/2-ç)

<ul style="list-style-type: none"> • Customer Transaction Data (Order Information, VIP status) 	<ul style="list-style-type: none"> • Provision of services. • Providing personal experience. • Execution of marketing activities. • Execution of finance and accounting works. 	<ul style="list-style-type: none"> • Data processing is necessary, provided that it is directly related to the performance of the contract with the guest. (Art.5/2-c) • It is mandatory for the data controller to fulfill its legal obligation. (Art.5/2-ç) • Data processing is mandatory for the legitimate interests of the company, provided that it does not harm fundamental rights and freedoms. (Art.5/2-f)
---	--	--

In the first paragraph of Article 5 of the Law, it is stipulated that the personal data cannot be processed without the explicit consent of the person concerned and in the second paragraph of the article 5, the conditions under which the personal data can be processed without the explicit consent of the data subject are listed. These conditions are below:

- It is expressly permitted by any law.
- It is necessary in order to protect the life or physical integrity of the data subject or another person where the data subject is physically or legally incapable of giving consent.
- It is necessary to process the personal data of parties of a contract, provided that the processing is directly related to the execution or performance of the contract.
- It is necessary for compliance with a legal obligation which the controller is subject to.
- The relevant information is revealed to the public by the data subject herself/himself.
- It is necessary for the institution, usage or protection of a right.
- It is necessary for the legitimate interests of the data controller, provided that the fundamental rights and freedoms of the data subject are not harmed.

Existence of one of the above-mentioned conditions and processing for the purpose and scope required by the relevant condition makes the processing of personal data lawful. In this context, it is lawful for our Company to process your personal data without your explicit consent, limited to the purposes specified in the table, and based on the conditions (legal reasons) specified in the Law.

4. TO WHOM AND FOR WHAT PURPOSES THE PROCESSED PERSONAL DATA MAY BE TRANSFERRED

PURPOSE OF TRANSFER	LEGAL REASON FOR TRANSFER	TRANSFERRED PERSON / ORGANIZATION
<ul style="list-style-type: none"> • Making reservation confirmations. 	<ul style="list-style-type: none"> • Data processing is necessary, provided that the contract is concluded with the guest and it is directly related to the performance of this contract. (Art.5/2-c) 	<ul style="list-style-type: none"> • Business partner websites and agencies that the company works with

<ul style="list-style-type: none"> Recording and updating. 	<ul style="list-style-type: none"> Data processing is mandatory for the legitimate interests of the company, provided that it does not harm fundamental rights and freedoms. (Art.5/2-f) 	<ul style="list-style-type: none"> Data recording medium of the owner of the computer program used.
<ul style="list-style-type: none"> Receiving consultancy in order to fulfill the requirements within the scope of tax legislation and other relevant legislation. 	<ul style="list-style-type: none"> Data processing is mandatory for the establishment, exercise or protection of a right. (Art.5/2-e) It is mandatory for the Company, which is the data controller, to fulfill its legal obligation. (Art.5/2-ç) 	<ul style="list-style-type: none"> Audit firms. Independent audit firms. Financial advisor/ accounting firms. Law offices.
<ul style="list-style-type: none"> Providing finance/accounting works according to the division of labor created in accordance with the structuring of the affiliated group company. 	<ul style="list-style-type: none"> Data processing is mandatory for the legitimate interests of the company, provided that it does not harm fundamental rights and freedoms. (Art.5/2-f) 	<ul style="list-style-type: none"> Domestic affiliate.
<ul style="list-style-type: none"> Fulfillment of legal requirements. Fulfilling the demands of official authorities. 	<ul style="list-style-type: none"> It is mandatory for the Company, which is the data controller, to fulfill its legal obligation. (Art.5/2-ç) 	<ul style="list-style-type: none"> Public institutions and organizations
<ul style="list-style-type: none"> Promotion, marketing and advertising of the company and the events it organizes. 	<ul style="list-style-type: none"> Explicit consent (Art.5/1) 	<ul style="list-style-type: none"> Company's website Company's social media accounts (Instagram and Facebook)

In the 1st sentence of the 8th article of the Law, it is stipulated that the personal data cannot be transferred without the explicit consent of the data subject and in the 2nd sentence of the 8th article, the second paragraph of the 5th article is referred to for the conditions in which the personal data can be transferred without the explicit consent of the data subject. These conditions are below:

- It is expressly permitted by any law.
- It is necessary in order to protect the life or physical integrity of the data subject or another person where the data subject is physically or legally incapable of giving consent.
- It is necessary to process the personal data of parties of a contract, provided that the processing is directly related to the execution or performance of the contract.
- It is necessary for compliance with a legal obligation which the controller is subject to.
- The relevant information is revealed to the public by the data subject herself/himself.
- It is necessary for the institution, usage or protection of a right.
- It is necessary for the legitimate interests of the data controller, provided that the fundamental rights and freedoms of the data subject are not harmed.

Presence of one of the conditions mentioned above and transferring for the purpose and scope required by the relevant condition makes the transfer of personal data lawful. In this context, it is lawful for our Company to transfer your personal data without your explicit consent, limited to the purposes specified in the table and based on the conditions (legal reasons) specified in the Law.

5. RIGHTS OF THE DATA SUBJECT

Under the law, you have the following rights regarding your personal data.

- Learn whether or not your personal data have been processed.
- Request information as to processing if your data have been processed.
- Learn the purpose of processing of the personal data and whether data are used in accordance with their purpose.
- Know the third parties in the country or abroad to whom personal data have been transferred.
- Request rectification in case personal data are processed incompletely or inaccurately.
- Requesting the deletion or destruction of personal data in case the reasons requiring the processing of personal data disappear.
- Requesting notification of the above-mentioned correction, deletion or destruction processes to third parties to whom personal data has been transferred.
- Object to occurrence of any result that is to your detriment by means of analysis of personal data exclusively through automated systems.
- Request compensation for the damages in case the person incurs damages due to unlawful processing of personal data.

In order to exercise your above-mentioned rights, you can send your request, which includes the information below, in a signed and written form to our postal address (Geriş Mah. 6026 Sokak No. 5), including the relevant information and documents, if any, or you can send it to our e-mail address (info@spektr-hotel.com) using your e-mail address. You can also obtain a sample application form from the legal department.

The mandatory information to include in your application is below:

- a. Name, surname and signature if the application is written.
- b. For citizens of the Republic of Turkey, identification number, nationality for foreigners, passport number or identification number, if any.
- c. Domicile or workplace address for notification.
- d. If available, the e-mail address, telephone and fax number for notification.
- e. The subject of the request.

Your applications within this scope will be concluded free of charge as soon as possible and within thirty days at the latest, depending on the nature of the request. However, if the transaction incurs an additional cost, if you will receive a written response, up to ten pages will not be charged. A transaction fee of 1 Turkish Lira may be charged for each page over ten pages. In addition, if the response to the application is given in a recording medium such as CD or flash memory, the fee that may be requested by Spektr cannot exceed the cost of the recording medium. If the application is caused by the fault of Spektr, the fee will be refunded to you.

INFORMATION NOTICE MINUTES

I am informed about the method, purpose and legal reasons and the rights I have regarding the processing and transfer of my personal data by the company and I received a copy of the Information Notice for the Guest by hand.

GUEST:

Name, Surname:

Date:

Signature:

S P E K T R

BOUTIQUE HOTEL YALIKAVAK

Within the scope of the Personal Data Protection Law Explicit Consent Statement

I accept and declare that I have read and understood the Information Notice of Employee submitted to me by the Spektr Otel Turizm Danışmanlık İnşaat Emlak Mobilya Teknik Servis Hizmetleri Sanayi ve Ticaret Limited Şirketi ("Company") within the scope of the Law No. 6698 on the Protection of Personal Data ("Law").

In this context, I consent / do not consent to the shooting and processing of my photos and audio/silent videos at the Company campus or at the events it organizes, for the purposes of promoting, marketing and advertising the Company and its events and to the sharing of these photos and audio/silent videos on the Company's website and the Company's social media accounts (Instagram and Facebook) for the purposes of promoting, marketing and advertising the Company and the events it organizes.

☐ I consent.

☐ I do not consent.

GUEST:

Name, Surname:

Date:

Signature: